

REMARKS

Claims 8 – 19 remain in the application and stand rejected. Claims 1 – 7 are previously canceled prejudice as being drawn to a non-elected invention. New claims 20 – 25 are added herein. The rejection of claims 8 – 19 is respectfully traversed.

New claims 20, 22, and 24 recite that the “data generation module generates variable data from system parameters for a monitored system.” This is supported in the specification at paragraph 0016 (“data generation module 106 generates variable data, e.g., from system monitored parameters, which may be stored in input data store 108.”). No new matter is added. New claims 21, 23, and 25 recite that the “data generation module receives and formats raw data for a system and stores formatted system data in a local data store.” This is supported in the specification at paragraph 0018 (“Thereafter during operation, the data generation module 106 receives and formats raw system data and stores it, locally in data store 108.”). No new matter is added. No reference of record teaches or suggests a system such as claimed in new claims 20 – 25 that includes a data generation module generating variable data from system parameters for a monitored system; or formatting raw system data and storing the formatted data in a local store. Independent consideration and allowance of claims 20 – 25 is respectfully requested.

Claims 8 – 19 are rejected under 35 U.S.C. §103(a) over U.S. Patent Application No. 2003/0014442 to Shiigi et al. in view of U.S. Patent No. 6,424,980 to Iizuka et al. alone or in further combination with U.S. Patent Application No. 2002/0138509 to Burrows et al. or U.S. Patent No. 6,714,931 to Papierniak et al. The rejection is respectfully traversed.

The Office action assert that the recitation of “a data generation module generating variable data for display” in claim 8, for example, is taught by Shiigi et al. *See also*, claims 14 and 17. Specifically, it is asserted that “data generation module generating variable data” is taught by “content objects that will appear or be used on the webpages.” Shiigi et al. paragraph 0039. However, Shiigi et al. content objects are placeholders for actual content elements. Paragraph 0039 (“Instances of content objects are created in the Object Model and are referenced by tags inserted in the templates as placeholders for the actual content elements ...”). Placeholders (i.e., content objects) are hardly variable data. *Id.*, (“a resource is the actual content element referenced by the placeholder, such as text, graphics, video or animation files.”). Nor, necessarily, are “text, graphics, video or animation files” variable data, at least not as taught by Shiigi et al. Nor does Shiigi et al. teach or suggest generating content objects by a data generation module, especially from raw system data.

Iizuka et al. figures 11 and 12 are relied upon to disclose “an html document table and HTML document to table mapping table.” However, even if the applicants were to accept, *arguendo*, this is what Iizuka et al. figures 11 and 12 show and, further that this suggests “each said single entry for each of said ones pointing to a corresponding repeatable data structure and a page map for tabular data lists in said corresponding repeatable data structure, said tabular data lists being displayed as a table on a generated said HTML document” as the Office action asserts; neither Shiigi et al. nor Iizuka et al. teaches or suggests “a data generation module generating variable data for display,” as recited in claims 1, 14 and 17. Therefore, the combination of Shiigi et al. and Iizuka et al. still would not result in the present invention, as recited in claims 1, 14 and 17 or any claims depending therefrom. Reconsideration and withdrawal of the rejection to claims 8, 11, 13, 14 and 17 under 35 U.S.C. §103(a) is respectfully requested.

Nor does either Burrows et al. or Papierniak et al. teach “a data generation module generating variable data for display,” as recited in claims 1, 14 and 17. MPEP §

608.01(n) II and III (“The test for a proper dependent claim under the fourth paragraph of 35 U.S.C. 112 is whether the dependent claim includes every limitation of the claim from which it depends.”).

Moreover, with regard to claim 9, for example, Burrows et al. is relied upon to teach that “adding HTML template files increases the size of each of said data generation module and said page generation module **only** by the length of a corresponding said single entry for each said added HTML template file.” Claim 9, lines 2 – 4 (emphasis added). Thus, the Office action asserts “that if the number of web pages in the network is large, the amount of memory required to store the url's and links in the web database will be correspondingly large.” containing the increase in file size by the length of the corresponding “single entry for each said added HTML template file” as claimed, is not the same as adding “the amount of memory required to store the url's and links” to make “the web database ... correspondingly large.” This is just what the present invention avoids. Paragraph 0024 (“However, instead of individual links to each tabular data list 146, 148, 150, 152, 154, the page pointer table 162 includes a corresponding 32 bit pointer 176M to a page map 178, 180 with an 8 bit (for $N \leq 255$) number 176N indicating the number of page map entries.”). It is because the Burrows et al. “web database will be correspondingly large” that Burrows et al. must “put a limit on the length of reference chains for decompressing a row” as the Office action acknowledges in the first paragraph of page 9. Accordingly, the combination of Burrows et al. with Shiigi et al. and Iizuka et al. does not result in or suggest the present invention, as recited in claim 9, in claims 1, 14 and 17 or any claims depending therefrom.

Papierniak et al. col. 9 lines 19 – 21 is relied upon in rejecting claims 9, 10, 12, 15, 16, 18 and 19. Specifically, the Office action asserts that this Papierniak et al. passage teaches “that a page map contains a plurality of data records. That each of the records also **stores** a combined length for **all** the bytes sent for the web page file and the other type files.” Page 12, second from last paragraph (emphasis added). First that is not

what Papierniak et al. col. 9 lines 19-21 teaches; and second, if it was the result of the combination would not be the present invention.

Papierniak et al. col. 9 lines 19 – 21 teaches that, a “utility application 112 **calculates** a length [for each of the web page files] by combining the bytes sent for the one web page file with the bytes sent for the other type files linked in the one web page file.” Calculating a web page length is not what any of claims 9, 10, 12, 15, 16, 18 and 19 recite. Therefore, the combination of Papierniak et al. with Shiigi et al. and Iizuka et al. does not result in or suggest the present invention as recited in claims 1, 14 and 17, much less claims 9, 10, 12, 15, 16, 18 and 19 depending therefrom. Reconsideration and withdrawal of the rejection to claims 9, 10, 12, 15, 16, 18 and 19 under 35 U.S.C. §103(a) is respectfully requested.

The applicants thank the Examiner for efforts, both past and present, in examining the application. Believing the application to be in condition for allowance for the reasons set forth above, the applicants respectfully request that the Examiner consider new claims 20 – 25, reconsider and withdraw the rejection of claims 8 – 19 under 35 U.S.C. §§102(a) and 103(a) and allow the application to issue.

As the applicants have previously noted, MPEP §706 “Rejection of Claims,” subsection III, “PATENTABLE SUBJECT MATTER DISCLOSED BUT NOT CLAIMED” provides in pertinent part that

If **the examiner** is satisfied after the search has been completed that patentable subject matter **has been disclosed** and the record indicates that **the applicant intends to claim** such subject matter, he or she may note in the Office action that **certain aspects or features** of the patentable invention have not been claimed and that if properly claimed such claims **may be given favorable consideration**.

(emphasis added.) The applicants believe that the written description of the present application is quite different than and not suggested by any reference of record and that the claims as amended reflect those differences. However, should the Examiner believe

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anything further may be required, the Examiner is requested to contact the undersigned attorney at the local telephone number listed below for a telephonic or personal interview to discuss any other changes.

Please charge any deficiencies in fees and credit any overpayment of fees to IBM Corporation Deposit Account No. 09-0449 and advise us accordingly.

Respectfully Submitted,

September 4, 2007
(Date)

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